

April 8, 2026

Supplementary Letter RE: HS10.5 - Supporting Unhoused Rights Holders Working Group Chair Update

The Enhanced Outreach Model (EOM), as embedded in the Interdivisional Protocol on Encampments (IDP), sets a standard that is a marked improvement over previous approaches to encampments by the City of Toronto. Specifically, the EOM enshrines support — not enforcement — as its de facto response, and codifies human rights principles in how the city engages encampments. It is modelled after best practices espoused by experts and advocates, including the Federal Housing Advocate, and I supported it when it became policy in 2024.

However, aspirations, policy, and implementation are not always aligned. In large part, this is because the City of Toronto continues to contend with a homelessness crisis that is largely being driven by policies at upper levels of government — particularly the province. The city is being put in a position of having to continually scale up programs and services while lacking the resources and powers to stop the unfettered flow of people into homelessness. Whatever our aspirations are at the municipal level, they are not supported by the provincial or federal governments.

I fully empathize with this predicament. However, I am also greatly concerned about a backsliding of municipal protocol away from a human rights approach and toward police-led responses and enforcement. This was the approach in 2021 when encampment residents in Trinity Bellwoods Park, Alexandra Park, and Lamport Stadium were forcibly removed.

Right now, the EOM — and the IDP more generally — are at risk because of growing public frustrations with homelessness. We've already seen a motion from Councillor Bradford that erodes the IDP by establishing "bubble zones" around schools, playgrounds, and daycares. Premier Ford has also passed the Safer Municipalities Act, which punishes people living in encampments with potential fines, jail time, or both. These are dangerous, enforcement-based policies that undermine the support-first, human rights principles established in the EOM and the IDP.

As the Chair of the Supporting Unhoused Rights Holders working group with the Housing Rights Advisory Committee, it is of the utmost importance to me and to our committee that we both preserve and expand a human rights approach to encampments in Toronto. Our goal is that there be no encampment evictions in our city, understanding that they are a gross violation of encampment residents' human rights.

However, in order to begin meeting this goal, the City of Toronto must demonstrate that the EOM and the IDP are an improvement over its previous, enforcement-based approaches, i.e., police-led encampment evictions.

Given the upcoming end to the Council term, it would be a good idea for the Encampment Office, led by Toronto Shelter and Support Services (TSSS), to compile quantitative and qualitative data comparing and contrasting outcomes (including housing and health outcomes, as well as cost-versus-benefit analyses) from encampments supported through

the Enhanced Outreach Model and encampments cleared before the adoption of the Interdivisional Protocol on Encampments (IDP).

Many thanks,

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Chair, Supporting Unhoused Rights Holders Working Group, Housing Rights Advisory Committee